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March 19, 2021

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully requests permission to travel to his son's home in Franklin Lakes, New Jersey on Easter Sunday, April 4, 2021, from the hours of 3:00 pm to 8:00 pm to celebrate Easter with his children and grandchildren. Only family members will be present at the gathering. His son's home is only twenty minutes from Cahill's residence and the exact address has already been provided to the government and Pretrial Services ("Pretrial"). The government, by Assistant United States Attorney Jason Swergold, consents to this application. Pretrial, by United States Pretrial Services Officer Andrew Abbott, does not consent pursuant to Pretrial's policy not to consent to travel for social reasons for defendants on home detention.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Danielle Sassoon
AUSA Jun Xiang
SAUSA Laura de Oliveira
USPTO Andrew Abbott